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23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 SONOS, INC.,

27 Plaintiff,

28 v.

GOOGLE LLC,

Defendant.

Case No. 3:20-cv-06754-WHA

Related to Case No. 3:21-cv-07559-WHA

**GOOGLE LLC'S RESPONSE TO
REQUEST FOR INFORMATION (DKTS.
649, 661)**

Google LLC (“Google”) files this response pursuant to the Court’s Request for Information (Dkts. 649, 661). Google’s responses to the Court’s questions are below.

1. In the real world, how much money has the IFTTT app developer received as a result of sales on the Google Play store?

From the time the IFTTT app was first made available on the Google Play store through December 31, 2022, IFTTT received [REDACTED]. This includes revenue generated from subscription fees paid for different plans at different prices over time.

2. In the real world, how many downloads have been made of the IFTTT app?

From 2018 through May 4, 2023, the IFTTT app has been downloaded from the Google Play store [REDACTED] times. The [REDACTED] downloads were free downloads. Of those free downloads, [REDACTED] were downloaded in the United States between November 2019 and November 2022.

From the time the IFTTT app was first made available on the Google Play store through December 31, 2022, the total number of worldwide financial transactions associated with the IFTTT app was [REDACTED]. Google is still confirming whether this number includes (i) each monthly subscription fee charged as the result of the purchase of one subscription or (ii) only each initial purchase of a subscription.

3. How many users have the Google Home app installed?

From November 24, 2020 (the hypothetical negotiation date for the ’966 patent) through November 15, 2022 (the last date for which data was available at the close of discovery), there were [REDACTED] installations of the Google Home App. This number includes all installations on any device, regardless whether such installations were ever used at all (and regardless whether such installations were ever used to save/invoke groups of overlapping speakers).

4. How many uses does Sonos accuse of infringing the patents?

Sonos separately accuses of infringement (i) every Google device with a speaker ([REDACTED] devices) plus (ii) every phone or tablet with the Google Home app installed ([REDACTED] devices). In total, Sonos’s damages base is [REDACTED] devices.

To obtain the benefit of the alleged invention, one must use the Google Home app installed on a phone or tablet to save overlapping groups of at least three Google speakers. Google does not

have data that counts directly how many times the Google Home app has been used to save overlapping groups of three or more Google speakers.¹ But Google does have a 200-day data set from 2022 that describes the number of Google speakers in a group (regardless whether that group is saved or ad hoc, invoked if saved, and/or overlapping with another group). That data shows that [REDACTED] [REDACTED]. Ex. 2 (Summary of large multi-tabbed Excel file) at Exhibit 4.4.² Additional Google data from the same time period shows that [REDACTED] of these Google speakers that are in a group are in a *saved* group (which may or may not be invoked or overlapping with another group), as opposed to a non-accused, non-infringing, ad-hoc, dynamic group. *Id.* (same) at Exhibit 4.3. Mr. Malackowski did not use this information to inform his damages analysis. Ex. 1 at 243:12-21, 244:16-19.

DATED: May 5, 2023

Respectfully submitted,

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By */s/ Sean Pak*

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¹ There are many non-accused ways to use the Google Home app, for example to control doorbells, security systems, thermostats and so on.

² All cited exhibits are attached to the contemporaneously filed Declaration of Lindsay Cooper.

CERTIFICATE OF SERVICE

The undersigned certifies that on May 5, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system.

DATED: May 5, 2023

/s/ Sean Pak

Sean Pak